

## **EXHIBIT B**

***Jacobsen v Ethicon, Inc., et al.***  
**2:13-cv-24530**

## Expert Opinion

Re: Jacobsen, Joni

The patient had a tension-free vaginal tape-obturator for sling placement for an indication of stress urinary incontinence in October 2011. She was subsequently diagnosed to have midurethral and vaginal erosion due to the sling placement in December 2012 then the patient undergone transvaginal removal of both left and right side vaginal meshes (due to erosion) in February 2013. Based on the Pathology report provided, the mesh material was evident. Her tissues reacted to foreign body (mesh) with subsequent inflammation and this is the most likely cause of her symptoms and signs (erosion, bladder abnormality) of the patient. As a result, the patient required subsequent surgery to remove the foreign body and reconstruct her pelvis. The above interpretation is based on the review of the pathology report in 2013 showing mesh material removed and several clinical documents including operation notes from the Loyola Medicine.

In arriving at my opinions in this case, I have relied on my background, training and experience, and my research, data available in other peer-reviewed publications, and my review of the medical documents made available to me. All of my opinions contained in this report are held to a reasonable degree of scientific and medical certainty, and I reserve the right to change or modify these opinions upon my review of additional information.

List of other cases I have testified as an expert in the last 4 years:

### Deposition Date: July 11, 2017

Gibbs Henderson from Waters & Kraus.

Richardson, et al. v. C.R. Bard, Inc. case No.:2:13-ev-20036 In the United States District Court for the Southern District of West Virginia Charleston Division

Barker, et al. v. C.R. Bard, Inc. case No.:2:13-ev-33690 In the United States District Court for the Southern District of West Virginia Charleston Division

Cuffee, et al. v. C.R. Bard, Inc. case No.:2:14-ev-02528 In the United States District Court for the Southern District of West Virginia Charleston Division

Cooley, et al. v. C.R. Bard, Inc. case No.:2:14-ev-07543 In the United States District Court for the Southern District of West Virginia Charleston Division

### Deposition Date: May 10, 2018

Rhonda Meredith v. Larry Mapow, MD

Fee structure:

- Phone consultation: \$400/hr

- Review medical charts and related documents, drafting/finalizing report and trial/deposition preparation: \$500/hr
- Pathology review of case (surgical material) including taking photos and tissue processing/staining: \$1200/case
- Deposition and related: \$600/hr
- Trial testimony: to be discussed

***Kmiec v Ethicon, Inc., et al.***  
**2:13-cv-24531**

## Expert Opinion

Re: Kmiec, Lisa A.

The patient had a procedure for transvaginal tape sling/mesh insertion for indications of stress urinary incontinence and cystocele in August 2012 at the Silver Cross Hospital. She was later diagnosed to have foreign body in the vagina and experienced left flank pain since sling procedure. The patient then had undergone transvaginal removal/excision of eroded vaginal meshes in January 2013. Based on the Pathology report from Loyola Medicine, the mesh material was identified from the surgical specimen. It was also noted that the synthetic mesh was extruding into the vagina (~2.5 cm) during the surgery. Her tissues reacted to foreign body (mesh) with subsequent inflammation and this is the most likely cause of her symptoms and signs. As a result, the patient required subsequent surgery to remove the foreign body and reconstruct her pelvis. The above interpretation is based on the review of the pathology report in 2013 showing mesh material removed and several clinical documents including operation notes as provided.

In arriving at my opinions in this case, I have relied on my background, training and experience, and my research, data available in other peer-reviewed publications, and my review of the medical documents made available to me. All of my opinions contained in this report are held to a reasonable degree of scientific and medical certainty, and I reserve the right to change or modify these opinions upon my review of additional information.

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Cuffee, et al. v. C.R. Bard, Inc. case No.:2:14-ev-02528 In the United States District Court for the Southern District of West Virginia Charleston Division

Cooley, et al. v. C.R. Bard, Inc. case No.:2:14-ev-07543 In the United States District Court for the Southern District of West Virginia Charleston Division

Deposition Date: May 10, 2018

Rhonda Meredith v. Larry Mapow, MD

Fee structure:

- Phone consultation: \$400/hr

- Review medical charts and related documents, drafting/finalizing report and trial/deposition preparation: \$500/hr
- Pathology review of case (surgical material) including taking photos and tissue processing: \$1200/case
- Deposition and related: \$600/hr
- Trial testimony: to be discussed

***Murray v Ethicon, Inc., et al.***  
**2:13-cv-24573**



## Expert Opinion

Re: Murray, Mary

The patient had a procedure for tension free vaginal tape obturator sling/mesh insertion for an indication of stress urinary incontinence in May 2010 at the University of Illinois at Chicago Medical Center. She was later diagnosed to have mixed urinary incontinence and experienced chronic pelvic pain since the sling placement procedure. She had undergone removal/excision of the sling mesh and urethrolisis in October 2012 and November 2013. Based on the Pathology reports from Rush University Medical Center and Loyola Medicine, the mesh material was present in surgical specimens. Her tissues reacted to foreign body (mesh) with subsequent inflammation and this is the most likely cause of her symptoms and signs. As a result, the patient required subsequent surgery to remove the foreign body and reconstruct her pelvis. The above interpretation is based on the review of the pathology report in 2012 and 2013 showing mesh material removed and several clinical documents including operation notes from the Loyola Medicine.

In arriving at my opinions in this case, I have relied on my background, training and experience, and my research, data available in other peer-reviewed publications, and my review of the medical documents made available to me. All of my opinions contained in this report are held to a reasonable degree of scientific and medical certainty, and I reserve the right to change or modify these opinions upon my review of additional information.

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Cooley, et al. v. C.R. Bard, Inc. case No.:2:14-ev-07543 In the United States District Court for the Southern District of West Virginia Charleston Division

Deposition Date: May 10, 2018

Rhonda Meredith v. Larry Mapow, MD

Fee structure:

- Phone consultation: \$400/hr

- Review medical charts and related documents, drafting/finalizing report and trial/deposition preparation: \$500/hr
- Pathology review of case (surgical material) including taking photos and tissue processing: \$1200/case
- Deposition and related: \$600/hr
- Trial testimony: to be discussed

***Rapacki v Ethicon, Inc., et al.***  
**2:13-cv-19758**

## Expert Opinion

Re: Rapacki, Mary

The patient had a procedure of tension free vaginal tape obturator sling/mesh insertion for an indication of stress urinary incontinence/prolapse in July 2011 in the Resurrection Medical Center. She was diagnosed to have mislocated (migrated) mesh (by report, 30 cm from the anal verge, approximately in the sigmoid colon, projecting through the colon wall into the lumen) according to colonoscopy findings in March 2012. Accordingly, sling revision/removal was performed by two colectomies done in April 2012 in the same institution. Pathology report confirmed foreign body in colon in April 2012 based on the Pathology report from Resurrection Medical Center. Her tissues reacted to foreign body (mesh) with subsequent inflammation, erosion and migration which together is the most likely cause of her symptoms in the colon. As a result, the patient required subsequent surgery to remove the foreign body and anastomosis of her colon. The above interpretation is based on the review of the pathology report in 2012 showing surgical mesh material removed from the colon and several clinical documents including operation notes from Resurrection Medical Center.

In arriving at my opinions in this case, I have relied on my background, training and experience, and my research, data available in other peer-reviewed publications, and my review of the medical documents made available to me. All of my opinions contained in this report are held to a reasonable degree of scientific and medical certainty, and I reserve the right to change or modify these opinions upon my review of additional information.

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Rhonda Meredith v. Larry Mapow, MD

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- Pathology review of case (surgical material) including taking photos and tissue processing: \$1200/case
- Deposition and related: \$600/hr
- Trial testimony: to be discussed